



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

March 5, 2002

James Shafer, Remedial Project Manager  
U.S. Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway  
Code 1823-Mail Stop 82  
Lester, PA 19113-2090

RE: Preliminary Remediation Goals Document, Response to RIDEM Comment Regarding Limited PRGs for Marine Sediment Old Fire Fighter Training Area, NETC, Naval Station Newport, Newport, Rhode Island

Dear Mr. Shafer,

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the Old Fire Fighter Training Area Preliminary Remediation Goals Report and subsequent correspondences and submittals. The following PRGs, will address marine ecological risk concerns associated with organic contaminants at the site (the Office of Waste Management is aware that a number of these PRGs were developed to address human health risk concerns):

2-Methylnaphthalene	185 ppb
Acenaphthylene	697 ppb
Benzo(a)anthracene	1338 ppb
Benzo(a)pyrene	134 ppb
Benzo(b)fluoranthene	1338 ppb
TPH	500 ppm

Due to SEM/AVS the Navy has not proposed ecological based PRGs for inorganic contaminants. SEM/AVS assumes static conditions, which may not be the case, as has been observed at McAllister Point Landfill. Therefore, the Office recommends that inorganic PRGs be applied to those sediments, which are likely to be disturbed during a severe storm event.

Finally, as stated in previous correspondences, the Office of Waste Management does not concur with the proposed PRG process for the site or the associated supporting documents, such as, the human and ecological risk assessments. Rather than enter into dispute resolution the Office of Waste Management and the Navy have agreed to forgo approval of this PRG process and supporting documents. This has proven beneficial in that it has avoided delays in the project, allows for an expedited remediation of the site, and has resulted in cost savings that can be applied directly to this or other sites. The Office of Waste Management is confident that other novel,

mutually agreeable, approaches, can be applied to other areas; and looks forward to working with the Navy in addressing the investigation and remediation of the NETC site.

If the Navy has any questions concerning the above please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa". The signature is written in dark ink and is positioned above the printed name.

Paul Kulpa  
Office of Waste Management

cc: Mathew DeStefano, DEM OWM  
Richard Gottlieb, DEM OWM  
Kymberlee Keckler, EPA Region I  
Melissa Griffin, NSN